

ANDREWS & KURTH

ATTORNEYS  
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TEXAS COMMERCE TOWER  
HOUSTON, TEXAS 77002  
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4400 THANKSGIVING TOWER  
DALLAS, TEXAS 75201  
(214) 979-4400

May 15, 1985

Elizabeth Ann Hurst, Esquire  
Office of Regional Counsel  
U.S. Environmental Protection Agency  
Region VI  
1201 Elm Street  
Dallas, Texas 75270

Reference: Gimble Salvage Company  
Docket No. TSCA - VI - 102C

Dear Ms. Hurst:

Enclosed is the PCB cleanup report prepared by Mr. Richard B. Terrill, a consultant to Gimble Salvage Company, regarding the PCB contamination at Gimble Salvage's yard in the above-referenced matter.

As that report details, four sets of laboratory analyses were run and a considerable amount of contaminated soil was removed. The resulting soil samples show less than 1 ppm PCB at sites approximating those points where EPA's Mr. Richard Gigger took his October, 1984 samples and visually clean sampling sites at the remaining two sampling sites used by Mr. Terrill.

Subsequent to this cleanup, Mr. Gimble arranged for Rollins to transport two drums of PCB contaminated soil for proper disposal. (See Invoice No. 116164 attached.) Rollins confirmed the incineration of this soil on April 28, 1985, by letter to Gimble Salvage dated May 9, 1985 (see attached).

For this final stage of the PCB cleanup, Gimble Salvage expended the following amounts:

Fee to Mr. Terrill, consultant:	\$ 2,000.00
Rollins incineration of and transportation of 2 drums of PCB contaminated soil, April 26, 1985:	\$ 733.00
Charles V. Bacon, Inc. laboratory analyses, February 28, March 20, 25 and 31, 1985:	\$ 550.00
TOTAL	\$ 3,283.00

SUPERFUND  
FILE

FEB 04 1993

REORGANIZED

RECEIVED  
MAY 20 3 34 PM '85  
OFFICE OF  
EPA REGION 6

TXD 026 595 959

To recapitulate for you, to date Gimble Salvage, a small business, has spent the following amounts on cleanup of this PCB spill, which resulted from another company's illegal disposal of PCB capacitors in Gimble Salvage's scrap metal container:

Removal of 2 PCB capacitors by Rollins, June 22, 1984:	\$ 455.00
Truck rental, driver and day spent to and from Rollins to pick up empty drums for storage of PCB contaminated soil and to transport them to Gimble Salvage, July 1984:	\$ 100.00
Interim Legal Fees and Expenses 1984:	\$1,751.14
Rollins treatment of and transportation of 4 drums of PCB contaminated soil, November 26, 1984	\$ 2,787.00
Money expended in February and March above:	\$ 3,283.00
GRAND TOTAL	\$ 8,376.14

These figures do not include Mr. Gimble's time and labor, nor that of Gimble Salvage's employees who worked at removing the contaminated soil, nor the remaining unbilled legal fees and expenses incurred on behalf of Gimble Salvage in the amount of \$4,554.59.

Again, I would like to urge EPA to exercise the full extent of its discretion and to settle this case without imposing any penalty on Gimble Salvage Company. As you know, Gimble Salvage and Mr. Gimble personally have expended considerable time, energy and money to rectify this PCB spill in which they were the victims as much as anyone else. This administrative complaint has weighed heavily on Mr. Gimble and stressed him at a time when he was recovering from major heart surgery and was under doctor's orders to avoid stress. Nevertheless, he moved responsibly and effectively to contain and properly remove and dispose of the PCB capacitors and the PCB contaminated soil.

EPA initially proposed an \$8,000 penalty in this matter. Gimble Salvage has spent more than that amount in remedying the situation -- a situation in which the Company itself was never a "bad actor."

For these reasons, we urge EPA to settle this matter without imposing a further penalty on Gimble Salvage. Certainly the Toxic Substances Control Act grants the EPA Administrator the discretion to do so. 15 U.S.C. §2615(a)(2)(C). In the alternative, we request that EPA reduce any penalty to a de minimus amount.

Please call me if you have any questions.

Sincerely,

*Nancy W. Newkirk*

Nancy W. Newkirk

Enclosures

cc: Maynard Gimble



ROLLINS ENVIRONMENTAL SERVICES (TX) INC.

2027 BATTLEGROUND RD  
DEER PARK TX 77536  
713-479-6001

INVOICE

NO. 116164  
CUST NO. 01583  
DATE 04/30/85  
PAGE 1

INVOICE

GIMBLE SALVAGE CO  
3201 ENGELKEHOUSTON TX 77003  
ATT: ACCOUNTS PAYABLE

RECEIVED FROM

CUSTOMER REFERENCE

STREAM NO. &amp; DESCRIPTION

CARRIER REFERENCE

COD

H 14232  
PCB DEBRIS

RES

69341

ITEM NO.	B/L NO. B/L DATE MFST. NO.	PRICE CODE	DESCRIPTION	QUANTITY	UM	UNIT PRICE	AMOUNT
1	69344 4/26/85 TDWR125275	1109 3812  9999	TREATMENT PCB'S PCB TRANSPORTATION  TOTAL  PAID 4-26-85 CHECK # 39519	820.00 4.00	LBS	.6500 50.0000	533.0 200.0  733.0  733.00 -0-
PLEASE NOTE REMITTANCE ADDRESS							

TERMS: NET DUE UPON RECEIPT OF INVOICE

A SERVICE CHARGE OF 1.50% PER MONTH WILL BE CHARGED ON PAST DUE AMOUNTS.

INQUIRIES: PLEASE PHONE MARGIE HILL

AT 713-479-6001 WITH ANY QUESTIONS

REMIT TO: P.O. BOX 96233

CHICAGO

IL 60693

ATTACHMENTS:

COPY-TO:  
3201 ENGELKE

CUSTOMER ORIGINAL

RICHARD B. TERRILL  
10601 South Drive, No. 122  
Houston, Texas 77099

May 13, 1985

Nancy W. Newkirk, Esquire  
Andrews & Kurth  
1730 Pennsylvania Avenue, N. W.  
Suite 700  
Washington, D. C. 20006

Dear Ms. Newkirk:

At Mr. Gimble's request, I supervised the final cleanup of PCBs at the Gimble Salvage Company (Gimble Salvage), 3201 Engelke, Houston, Texas 77003, commencing on February 18, 1985. TXD 026 595 489

I have a B.A. degree awarded in 1960 from the University of Houston. Between the engineering courses I took at school and my practical experience in the oil industry, I have experience in field engineering, geology, civil engineering, and the clean up of oil spills. Mr. Gimble asked me to supervise the PCB cleanup and to arrange for testing of soil samples by a qualified laboratory.

The cleanup was completed as of March 22, 1985, and the soil sample tests conducted and discussed below reveal a level of PCB 1260 at less than 1 ppm in the areas of previous high concentration. Additionally, as of that date, the soil in the contaminated areas was cleared down to concrete and/or oyster shell bed, all of which looked clean to the eye.

I have set forth below, in chronological order, the background situation and the steps taken to clean up and test the site.

#### BACKGROUND

The following is a summary of the history of this problem as I understand it from Mr. Gimble.

Sometime in December, 1983, Gimble Salvage received two unknown objects, subsequently identified by EPA as PCB capacitors, in a container of mixed scrap metal picked up from one of Gimble Salvage's industrial accounts. The capacitors were sorted from the valuable metal scrap and left in Gimble Salvage's yard. One of the capacitors was leaking and was first located at point AA on the map attached as Attachment 1 and was subsequently moved and used as a gate-stop to hold open the gate to the yard, as also shown on the map. The other capacitor remained intact and non-leaking.

SUPERFUND  
FILE

FEB 04 1993

REORGANIZED

On December 30, 1983, EPA Inspector Richard Gigger made a routine inspection of Gimble Salvage's business location, saw the PCB capacitor holding open the gate to the material unloading area and identified it to Mr. Gimble. He also found the second capacitor. He took soil samples in the areas where the leaking capacitor had been. According to EPA, Mr. Gigger's samples revealed 1264 ppm of PCBs in the area where the leaking capacitor had been resting against the gate and 326 ppm and 337 ppm of PCBs at the other two sampling points.

On June 22, 1984, some two weeks after receiving the EPA Complaint in this matter, Mr. Gimble arranged for Rollins Environmental Services (Rollins) to remove the PCB capacitors.

At Mr. Gimble's direction, the soil in the area near the gate where the leaking capacitor had rested was cleared down to the level of the asphalt. The removed soil was placed in four drums supplied by Rollins.

On October 15, 1984, at Mr. Gimble's request, Mr. Gigger of EPA made a second inspection of the site and collected soil and water samples. Although Mr. Gimble had hoped to receive the results of EPA's second sampling before having the drums removed, he decided to go ahead and have the four drums of PCB contaminated soil removed from Gimble Salvage by Rollins even though it might cost him more money. Rollins removed the four drums on November 26, 1984.

In January 1985, Mr. Gimble received the results of the lab reports from Mr. Gigger's sampling, which showed PCB levels at 350 ppm and 407 ppm, and learned that he had to remove additional contaminated soil. This removal was impeded by heavy rains that fell in the Houston area in January and February, 1985, leaving water accumulations in Gimble Salvage's yard up to 6-8 inches deep.

#### FINAL CLEANUP

Under my supervision, soil samples were collected from sites #1 and #4, which were the approximate sample sites used by the EPA's Mr. Gigger on October 15, 1984, and from sample sites #2 and #3, near by. (See map at Attachment 1 for the locations of the sample sites.) Sample site #1 is about 8 inches from the concrete slab at the north end of Gimble Salvage's yard and at the time Mr. Gigger took his sample from this point, was the highest of the sample sites. Sample site #2 is approximately 8 feet to the west of site #1 that Mr. Gigger sampled and, at the time I first took my samples, was the closest point out of water to Mr. Gigger's. Subsequently, I found that the soil at site #2 covered a concrete slab. Sample site #3 was also selected because sample site #4 was underwater and it is approximately 25 feet south of sample site #2 near the lowest area in the yard and was selected in order to see where the PCB contamination may have migrated. Site #4 to the southwest was used by Mr. Gigger. Contaminated soil was removed and stored in drums for removal by Rollins.



On February 15, 1985, I collected the first two soil samples at sites #2 and #3 in order to define the levels of PCB contamination. Sample sites #1 and #4 were underwater and could not be sampled. Sample sites #2 and #3 were as close to these sites as I could get. The samples were sent to the Charles V. Bacon, Inc. laboratory for analysis. The laboratory results for the first samples showed PCB (as Aroclor 1260) levels of 40 ppm and 58 ppm for sites #2 and #3 respectively. (See Bacon Report of Analysis dated February 28, 1985 and Attachment 3).

Soil was shoveled away from sample site #2 and placed in removal drums, supplied by Rollins, revealing a concrete slab which was clean, not oily. The concrete slab was swept with a broom until all loose soil was removed and placed in drums. Soil was also removed at site #3 down to a level of asphalt that had been buried under the soil and water.

On March 7, 1985, when the yard had dried sufficiently, I took four more samples at sample sites #1-4 and sent them to Bacon for analysis. The results of this analysis are shown as Bacon Report of Analysis dated March 20, 1985 and in Attachment 3. Further soil cleanup was done at sample sites #1, #3 and #4.

A third set of samples was taken on March 19, 1985, at sample sites #1, #3 and #4 and sent to Bacon for analysis. Subsequent to this sampling, further soil was removed from the area around sites #1, #3 and #4. At site #1, it appears that due to the amount of annual rainfall, the PCB spill had percolated down through the loose soil and was contained by the asphalt. (See Attachment 2 cross-sectional drawings of sample sites #1, #3 and #4). Upon removal of the asphalt and removing one inch of the oyster shell at sites #1 and #4, the PCB contamination was virtually eliminated.

This was confirmed by the fourth and final set of soil samples taken from sample sites #1 and #4, both of which revealed less than 1 ppm of PCB. (See Bacon Report of Analysis dated March 31 and Attachment 3).

#### CONCLUSION

As of March 22, 1985, sample site #1 tested at less than 1 ppm PCB and has been cleared down through 1/2 inch of the oyster shell base which looks clean. Sample site #2 has been swept clean down to the concrete. The accumulation of soil apparently contained the PCBs because the surface appears clean and unstained. The area where soil was removed at sample sites #1 and #2 measures approximately 10 feet by 10 feet to a depth of approximately 5 inches. The whole area from the gate to sites #3 and #4 is clean down to the oyster shell base. The area where soil was removed between the gate and sample sites #3 and #4 measures approximately 35 feet by 12 feet to a depth of approximately 5 inches. Sample site #4 tested at less than 1 ppm PCB and since #3 was cleared to the same point and looks clean, it is safe to assume that #3 is clean as well.

Please call me if you have any questions.

Sincerely,



Richard B. Terrill

4 Enclosures:

Chas. v. Bacon Test Reports with Invoices:

Report #G40312 - Inv. #18118

Report #G40379 - Inv. #18175

Report #G40417 - Inv. #18196

Report #G40430 - Inv. #18231

3 Attachments:

1 - Site Plot

2 - Cross Section of Sample Sites

3 - Test Results by Date, Location and Depth

TELEPHONE (504) 347-1468  
TWX 810-8515260

# CHARLES V. BACON, INC.

A LOUISIANA CORPORATION  
INTERNATIONAL MARINE BULK OIL, CHEMICAL & CARGO  
SURVEYORS SAMPLERS & WEIGHERS  
ANALYTICAL & CONSULTING CHEMISTS  
P.O. BOX 97, MARRERO, LA. 70073

## TEXAS OFFICE

1308 Holland Avenue  
P.O. Box 65  
Galena Park, Texas 77547  
Telephone: 713-453-8355  
TWX No. 910-8813705

Gimble Salvage Co.  
3201 Engelke  
Houston, Texas 77003

Attn: Mr. Gimble

DATE: February 28, 1985

18118

Payable upon presentation  
All past due accounts subject to 1 1/2 % per month.

### PROFESSIONAL SERVICES:

Analysis submitted as soil, dirt, and water submitted  
on February 15, 1985

G 40312  
7750-1

2 Analysis at 50.00 ea

Total

100

00

100

00





REPORT OF ANALYSIS  
ISSUED BY  
**CHARLES V. BACON, INC.**

Bulk Oils, Chemicals  
Bulk Commodities  
Agri-Products  
General Cargo  
Technical Inspections  
Surveying, Sampling,  
Inspection, Supervision  
Loading, Discharging  
Consulting

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INTERNATIONAL MARINE BULK OIL, CHEMICAL & CARGO  
SURVEYORS SAMPLERS & WEIGHERS  
ANALYTICAL & CONSULTING CHEMISTS

1308 HOLLAND AVENUE, GALENA PARK, TEXAS 77547

TELEPHONE (713) 453-8355

P. O. BOX 65  
GALENA PARK, TEXAS 77547

TWX: 910-881-3705

CABLE: ANALYCHEM

NO. G 40312  
SAMPLE SUBMITTED AS Soil, dirt, water (2 samples)

DATE February 28, 1985

MARKED

RECEIVED FROM, OR  
FOR THE ACCOUNT OF

Gimble Salvage Co.

CERTIFICATE OF ANALYSIS

Sample	Results (as Aroclor 1260)
#1	58 ppm
#2	40 ppm

The above tests were conducted in accordance with current A.O.C.S. Methods, or other standard methods where applicable.

Respectfully submitted,

CHARLES V. BACON, INC.



SERVING THE INDUSTRIES SINCE 1908

CHICAGO  
2711 SERVICE ROAD  
P. O. BOX 441  
LAKEVIEW, ILLINOIS 60458  
(312) 855-0555  
TWX: 910-881-0555

NEW YORK AREA  
34 EXCHANGE PLACE  
JERSEY CITY, NEW JERSEY 07308  
(201) 432-0589  
TWX: 710-730-5215

NEW ORLEANS  
720 SARATOGA BLVD.  
P. O. BOX 87  
MARINEO, LOUISIANA 70073  
(504) 347-1486  
TWX: 810-881-5280

HOLLAND  
P. O. BOX 5810  
3008 AV ROTTERDAM  
TEL: 010-8878248/242  
TELEX: 38888 HOCRT NL  
CABLE: ANALYCHEM

CORRESPONDENTS AT PRINCIPAL WORLD PORTS

TELEPHONE (504) 347-1488  
TWX 810-9515280

## CHARLES V. BACON, INC.

A LOUISIANA CORPORATION  
INTERNATIONAL MARINE BULK OIL, CHEMICAL & CARGO  
SURVEYORS SAMPLERS & WEIGHERS  
ANALYTICAL & CONSULTING CHEMISTS  
P.O. BOX 97, MARRERO, LA. 70073

### TEXAS OFFICE

1308 Holland Avenue  
P.O. Box 65  
Galena Park, Texas 77547  
Telephone: 713-453-8355  
TWX No. 810-8813705

DATE: **March 20, 1985**

**Gimble Salvage Company**

**18175**

**Attn: Mr. Gimble**

Payable upon presentation  
All past due accounts subject to 1 1/2% per month.

#### PROFESSIONAL SERVICES:

**Analysis submitted as soil, dirt marked #1, #2, #3, #4,  
submitted on March 7, 1985**

**G 40379**

**4 Analysis @ 50.00 ea.**

**200. 00**

**Total**

**200 00**



0

6

5

# REPORT OF ANALYSIS

## ISSUED BY

# CHARLES V. BACON, INC.

Bulk Oils, Chemicals  
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Technical Inspections  
Surveying, Sampling,  
Inspection, Supervision  
Loading, Discharging  
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ANALYTICAL & CONSULTING CHEMISTS

1308 HOLLAND AVENUE, GALENA PARK, TEXAS 77547

TELEPHONE (713) 453-8355

P. O. BOX 65  
GALENA PARK, TEXAS 77547

TWX: 910-881-3705

CABLE: ANALYCHEM

NO. G40379

DATE March 20, 1985  
Received: March 7, 1985

SAMPLE SUBMITTED AS Dirt, soil

MARKED #1, #2, #3, #4

RECEIVED FROM, OR  
FOR THE ACCOUNT OF Gimble Salvage Company

### CERTIFICATE OF ANALYSIS

Sample	Results (as Aroclor 1260) PCB'S, ppm
#1	32 ppm
#2	480 ppm
#3	178 ppm
#4	273 ppm

The above tests were conducted in accordance with current A.O.C.S. Methods, or other standard methods where applicable.

Respectfully submitted,

CHARLES V. BACON, INC.



SERVING THE INDUSTRIES SINCE 1908

CHICAGO  
2533 SERVICE ROAD  
P. O. BOX 441  
LAKEVIEW, ILLINOIS 60435  
(312) 958-0880  
TWX: 910-881-0880

NEW YORK AREA  
36 EXCHANGE PLACE  
JERSEY CITY, NEW JERSEY 07310  
(201) 432-0889  
TWX: 710-720-8215

NEW ORLEANS  
718 SARATOGA BLVD  
P. O. BOX 87  
MARINER, LOUISIANA 70073  
(504) 247-1488  
TWX: 910-881-5380

HOLLAND  
P. O. BOX 5810  
3808 AV. ROTTERDAM  
TEL: 910-887344-857942  
TELEX: 380888-HOORT NL  
CABLE: ANALYCHEM

CORRESPONDENTS AT PRINCIPAL WORLD PORTS

TELEPHONE (504) 347-1468  
TWX 810-9515260

## CHARLES V. BACON, INC.

A LOUISIANA CORPORATION  
INTERNATIONAL MARINE BULK OIL, CHEMICAL & CARGO  
SURVEYORS SAMPLERS & WEIGHERS  
ANALYTICAL & CONSULTING CHEMISTS  
P.O. BOX 97, MARRERO, LA. 70073

### TEXAS OFFICE

1308 Holland Avenue  
P.O. Box 65  
Galena Park, Texas 77547  
Telephone: 713-453-8355  
TWX No. 910-8813705

DATE: March 25, 1985

Gimble Salvage Company

18196

Attn: Mr. Gimble

Payable upon presentation  
All past due accounts subject to 1 1/2% per month.

#### PROFESSIONAL SERVICES:

Analysis submitted as dirt, soil marked 1. #1A  
2. #3A 3. #4A on 3/19/85 submitted on March 20, 1985

G 40417  
7750-1

3 Analysis @ \$50.00 ea.

Total

150 00

150 00



Pd ch# 39420

REPORT OF ANALYSIS  
ISSUED BY  
**CHARLES V. BACON, INC.**

Bulk Oils, Chemicals  
Bulk Commodities  
Agri-Products  
General Cargo  
Technical Inspections  
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Inspection, Supervision  
Loading, Discharging  
Consulting

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SURVEYORS SAMPLERS & WEIGHERS

ANALYTICAL & CONSULTING CHEMISTS

1306 HOLLAND AVENUE, GALENA PARK, TEXAS 77547

TELEPHONE (713) 453-8355

P. O. BOX 85  
GALENA PARK, TEXAS 77547

TWX: 910-881-3725

CABLE: ANALYCHEM

SAMPLE SUBMITTED AS Dirt, soil

NO. G 40417

DATE March 25, 1985

MARKED 1. #1A on 3/19/85  
2. #3A on 3/19/85  
3. #4A on 3/19/85

RECEIVED FROM, OR  
FOR THE ACCOUNT OF Gimble Salvage Company

CERTIFICATE OF ANALYSIS

<u>SAMPLE</u>	<u>RESULTS (as Aroclor 1260) PCB's, ppm</u>
1.	22 ppm
2.	207 ppm
3.	371 ppm

The above tests were conducted in accordance with current A.O.C.S. Methods, or other standard methods where applicable.

Respectfully submitted,

CHARLES V. BACON, INC.



SERVING THE INDUSTRIES SINCE 1908

CHICAGO  
2832 SERVICE ROAD  
P. O. BOX 441  
LAKEVIEW, ILLINOIS 60458  
(312) 555-6555  
TWX: 910-881-3725

NEW YORK AREA  
24 EXCHANGE PLACE  
JERSEY CITY, NEW JERSEY 07310  
(201) 433-0555  
TWX: 710-720-8715

NEW ORLEANS  
720 PARATAMA BLVD.  
P. O. BOX 97  
HAVERBO, LOUISIANA 70073  
(504) 361-1465  
TWX: 510-661-6385

HOLLAND  
P. O. BOX 5810  
3006 AV. ROTTERDAM  
TEL: 010-87284-85742  
TELEX: 38888-HOORT NL  
CABLE: ANALYCHEM

CORRESPONDENTS AT PRINCIPAL WORLD PORTS



REPORT OF ANALYSIS  
ISSUED BY  
**CHARLES V. BACON, INC.**

Bulk Oils, Chemicals  
Bulk Commodities  
Agri-Products  
General Cargo  
Technical Inspections  
Surveying, Sampling,  
Inspection, Supervision  
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Consulting

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SURVEYORS SAMPLERS & WEIGHERS

ANALYTICAL & CONSULTING CHEMISTS

1308 HOLLAND AVENUE, GALENA PARK, TEXAS 77547

TELEPHONE (713) 453-8355

P. O. BOX 65  
GALENA PARK, TEXAS 77547

TWX: 910-881-3705

CABLE: ANALYCHEM

NO. G 40430  
SAMPLE SUBMITTED AS Dirt, soil

DATE March 29, 1985  
Received: 3/25/85

MARKED 1. #1 B on March 22, 1985  
2. #4 B on March 22, 1985

RECEIVED FROM, OR  
FOR THE ACCOUNT OF Gimble Salvage Company

CERTIFICATE OF ANALYSIS

SAMPLE	RESULTS (as Aroclor 1260) PCB'S, ppm
1B	LESS THAN 1
4B	LESS THAN 1

The above tests were conducted in accordance with current A.O.C.S. Methods, or other standard methods where applicable.

Respectfully submitted,

CHARLES V. BACON, INC.



SERVING THE INDUSTRIES SINCE 1908

CHICAGO  
2833 BEAUCHE ROAD  
P. O. BOX 441  
LAKEWOOD, ILLINOIS 60466  
(312) 895-6280  
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34 EXCHANGE PLACE  
JERSEY CITY, NEW JERSEY 07302  
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TWX: 710-730-8215

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730 BAHAMIA BLVD.  
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MARINER, LOUISIANA 70073  
(804) 347-1446  
TWX: 810-881-5280

HOLLAND  
P. O. BOX 5810  
3008 AV. ROTTERDAM  
TEL: 010-807524-807642  
TELEX: 38208-NOOTR NL  
CABLE: ANALYCHEM

CORRESPONDENTS AT PRINCIPAL WORLD PORTS

TELEPHONE (504) 347-1468  
TWX 810-9515260

## CHARLES V. BACON, INC.

A LOUISIANA CORPORATION  
INTERNATIONAL MARINE BULK OIL, CHEMICAL & CARGO  
SURVEYORS SAMPLERS & WEIGHERS  
ANALYTICAL & CONSULTING CHEMISTS  
P.O. BOX 97, MARRERO, LA. 70073

### TEXAS OFFICE

1308 Holland Avenue  
P.O. Box 65  
Galena Park, Texas 77547  
Telephone: 713-453-8355  
TWX No. 910-8813705

Gimble Salvage Company

DATE: March 31, 1985

18231

Attn: Mr. Gimble

Payable upon presentation  
All past due accounts subject to 1½% per month.

#### PROFESSIONAL SERVICES:

Analysis submitted as dirt, soil marked 1B, and 4B  
on March 22, 1985 submitted on March 25, 1985

G 40430  
7750-1

Analysis

100. 00

Total

100. 00



## OVERSIZE DOCUMENT

The page that occupies this position in the paper document is:

Oversized document number:

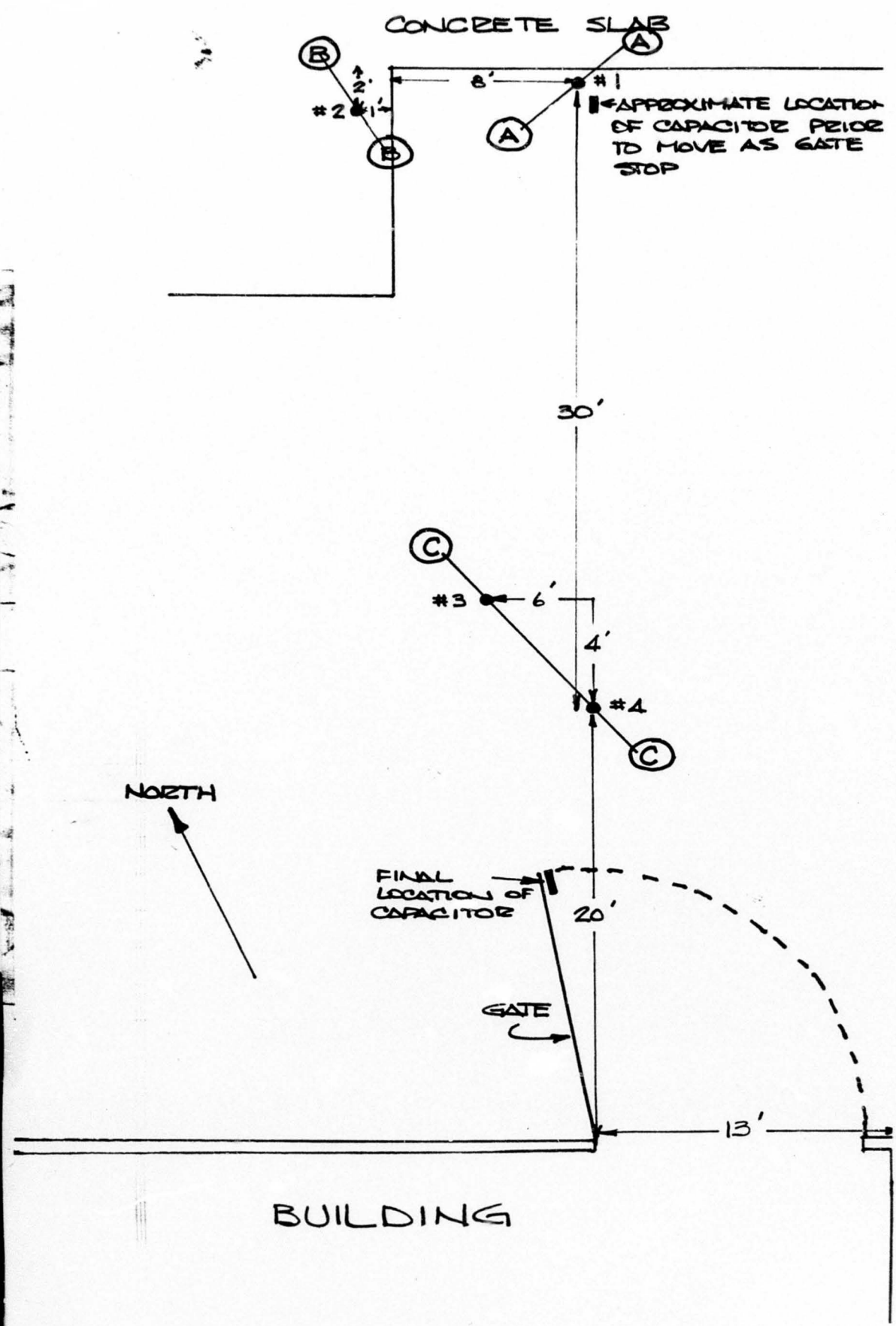
~~TXD 026595959~~  
SF SA VOL 01

on the roll of 35mm film.

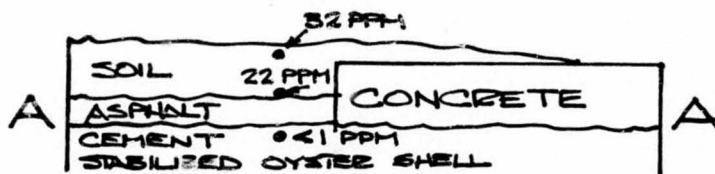
Titled:

RL6-HS-R-TX M 002

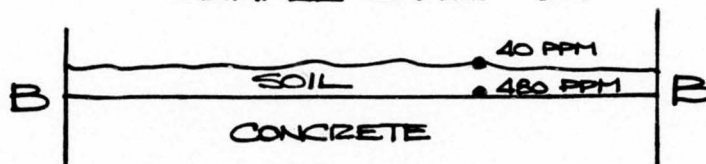
ATTACHMENT # 1



## SAMPLE SITE #1

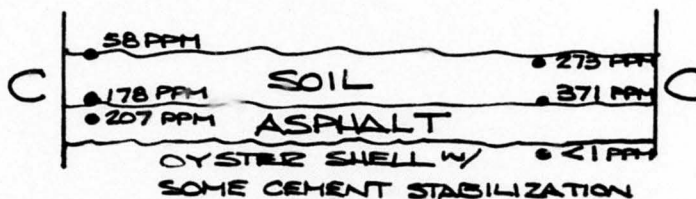


## SAMPLE SITE #2



## SAMPLE SITE #3

## SAMPLE SITE #4



## SECTION AA:

3" SOIL, 2" ASPHALT, 3" OYSTER SHELL

## SECTION BB:

2" TO 3" SOIL ON TOP OF CONCRETE

## SECTION CC:

3" SOIL, 2" ASPHALT, 3" TO 4" CEMENT STABILIZE OYSTER SHELL



## ATTACHMENT #3

## SAMPLE SITE #1

<u>DATE</u>	<u>PPM</u>	<u>DEPTH</u>
3/7/85	32	2"
3/19/85	22	4"
3/22/85	< 1	5"

## SAMPLE SITE #2

<u>DATE</u>	<u>PPM</u>	<u>DEPTH</u>
2/18/85	40	SOIL SURFACE
3/7/85	480	CONCRETE SURFACE

## SAMPLE SITE #3

<u>DATE</u>	<u>PPM</u>	<u>DEPTH</u>
2/18/85	58	1"
3/7/85	178	3"
3/19/85	207	4"

## SAMPLE SITE #4

<u>DATE</u>	<u>PPM</u>	<u>DEPTH</u>
3/7/85	273	1"
3/19/85	371	3"
3/22/85	< 1	5"